Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)
	)
Wireless E911 Location Accuracy Requirements	) **PS Docket No. 07-114**
	)
E911 Requirements for IP-Enabled Services Providers	) **WC Docket No. 05-196**
	)

COMMENTS OF MOBILETREC CORPORATION

We believe that, when confronted with adversity or crisis, individuals wish to stand together and provide each other assistance, and that this feeling permeates the social fabric of the entire United States regardless whether you're a police officer, paramedic, firefighter, mom, dad, aunt, uncle, friend or neighbor. By utilizing location information systems, internet connectivity, advanced handsets and our innovative and propriety software, MobileTREC provides the tools necessary to empower individuals and mobilize communities to help one another.

Consumers feel that having a Smart-phone is great fun. They enjoy making phone calls, sending text messages, surfing the internet, accessing email and reading file attachments. They especially delight in being empowered with the ability to do this anytime and anywhere.

Now consumers are looking for more from their Smart Phones, and vendors are looking for ways to capitalize on the revolution Apple started. Up until now, consumers have been limited by the range of the cell phone network as to where and when they could make phone calls. Today, with VoIP on the Mobile Phone, they can use the internet to make those calls, and they don't have to pay nearly as much for them as when using cell phone minutes.

Even if there is a cell phone network signal available, consumers can choose to use the internet to make those calls, rather than the cell phone signal, thereby avoiding using cell phone minutes which often cost much more.

The problematic aspect of these amazing advancements is that very few consumers consider the safety aspects – until they are in the midst of a crisis, or well after tragedy has struck. Consumers are not going to consider whether 911 can locate them in an emergency, much less whether they can call 911; they use these devices because they are convenient and fun.

Very few people care where you are as long as you are healthy, happy, and they can talk to you when they feel like it - unless danger strikes. Then everyone wants to know where you are; they expect to know where you are located so that they can be helpful, not helpless. They want to help. By combining carrier technology with our innovations, we've extended emergency services. Our service encourages subscribers to reach for help "whenever something just does not feel right". It goes further to recognize that emergency personnel are

not necessarily the only people you may want to contact and sometimes are not necessary when friends and family are closer and better able to provide assistance. When something does not “feel right” our subscribers press a button on their Smart Phone. This immediately triggers a massive response to help them when and where they need assistance. All the people who know, love, and care about the caller are brought into voice communication within a few seconds, video is instantly streamed, and our call center monitors the situation to determine if direct and immediate routing to the nearest PSAP is necessary. In this way, our solution both extends emergency services and could result in putting less stress on PSAPs; reserving PSAPs for only those emergencies where critical, professional assistance is required. And, when the caller is routed directly to the nearest PSAP, all the situational information is also delivered to the PSAP including, pictures, voice, video, SMS messages, vital contact information, guardian information, and vital personal information, as long as the PSAP is equipped to handle such information. In this way, we provide both the caller and the emergency responders with a rich data set that enhances the delivery of emergency services to the caller and provides valuable information to the emergency personnel. This information speeds appropriate delivery of services to the caller, while increasing the safety of the emergency personnel.

How do consumer usage patterns, marketing practices, consumer expectations, and the needs of the public safety community, including PSAPs and first responders, impact whether these additional communication services should be required to provide access to emergency services?

New technologies like Smart Phones give us the ability to enhance processes, make them more efficient, save money, and increase safety.

We have found that families want to be empowered. They want to know when someone they know, love, and care about needs help. In fact, they want to be the first to know and to be empowered to act. That is why we created the “Family Safety Network” which is a subscriber's personal security circle. The Family Safety Network is immediately mobilized in an emergency situation, utilizing voice, video, SMS, internet, GPS and Smart Phone technologies when someone on their safety network needs help; this is then supported by our call center's ability to route emergencies directly to the nearest PSAP. This, in turn, increases the quality of calls to the PSAP for the following reasons (i) the Family Safety Network is empowered to handle issues that should not involve 911 services, (ii) the request for emergency response is not automated, it is invoked by a human being, and (iii) PSAPs now have immediate access to an unprecedented amount of incident information and individuals who have vital information which can remove situational fog.

Should devices supporting voice-based applications, including those that access the macro cellular network, Wi-Fi, or both, incorporate the capability to become location aware or require subscriber self reporting of location?

Consumers should have the option to self-report and, once opted-in, the location reporting mechanism should be automatic. When relying on self-reporting or self-management that is not automatic, potentially wrong information may be provided. However, automatic self-reporting introduces privacy issues which must be addressed.

Privacy issues are paramount with our subscribers. While we provide a social network dedicated to a person's safety, this network is private and secure. Furthermore, all aspects of location sharing are opted into between subscribers; in this manner, we provide a platform by which safety is promoted, but not mandated. Subscribers can decide if, to whom, when, and where they share their location information when using our service. It is important to note that our service neither interferes with the carriers' configuration of their handsets, nor is it intended to replace that location information that will continue to be transmitted to PSAPs consistent with the relevant carriers' configuration and regardless of the privacy choice made by our users.

Should we require carriers to ensure delivery of location information to PSAPs for every call handled on their networks, including calls made by customers of another carrier ("roaming calls") that has deployed a different technology in its own network or with whom the carrier handling the call has no automatic roaming relationship?

With respect to our solution, Smart Phones with a GPS receiver are not limited by delivery of location information to PSAPs and "roaming calls" are not an issue. The reason is that the GPS coordinates are acquired from the Smart Phone's GPS receiver, then transmitted to our servers via the phone's internet connection. For those PSAPs that cannot receive latitude and longitude, we translate the coordinates to a physical address and deliver that address to the PSAP, thereby working within the existing technical limitations while providing a platform that will immediately take advantage of latitude and longitude as soon as the PSAP upgrades to a platform that accepts the transmission of this information.

Network coverage is most critical and a prerequisite to providing comprehensive personal safety. While we solve the issue of roaming by removing the wireless tower configuration from the equation and rely solely on GPS information received from the GSP receiver in the phone, we still rely on the existence of the connection between the handset and the internet. By providing as much network coverage as possible that includes at minimum data coverage, carriers are in a position to enable rapid and immediate response to citizens when and where they need help.

...what are the expectations of consumers using such technologies in terms of being able to dial 911, and having the PSAP know where they are located?

We conducted market research on this topic. The surveys were conducted as face-to-face interviews in the Greater Los Angeles area – Los Angeles County, Orange County, San Bernardino County and Riverside County. Areas were picked to give a diversity of income from generally middle income to upper income parents.

More than 54% of the consumers we surveyed believe or were uncertain that 911 knows their exact location when calling 911 from their cell phone; 46% believe that 911 does not know their location when calling from a cell phone. More importantly, 100% of the survey responders believe that they could dial 911 from their cell phone, and many were shocked when we demonstrated that dialing 911 using a soft phone on the Smart Phone did not connect to 911, and instead went to voice mail or gave a rapid pulsing busy signal.

Would there be a call back number?

Yes. In the discussions we have had with PSAPs, there is never a question that a call back number must exist. There has been significant and noteworthy debate about what the call back number should be. The debate centered around whether the call back number should be our call center or the subscriber's phone number. We continue to examine this issue and work with public safety to determine the best practice.

WCA argued that the Commission "fails to appreciate the enormous technical, operational and economic challenges wireless broadband network operators and their equipment suppliers will face if [the Commission] prematurely imposes ALI and location accuracy requirements on interconnected VoIP serve without further study."

We have found this argument to be implausible. This has been accomplished with the cooperation and testing of consumers and the incorporation of Smart Phone technology which utilizes GPS navigational abilities.

Which if any such device, services and applications should be made subject to 911 and E911 requirements?

Since a consumer's expectation is that all devices that have dial tone would have 911 service, then any device with dial tone should have a 911 solution, including nomadic or mobile VoIP services such as MagicJack, Skype, Vonage, and Google Voice.

Since a number of VoIP services and applications are offered by third party software developers, should we extend 911 and E911 requirements to such entities?

We have discovered that the consumer does not differentiate between technologies that are used to make a phone call. As a result, emergency calls are placed using cell phones, rather than land lines. As consumers do not recognize the limitations with emergency service, they do not understand the dangers associated with this limited technology.

Should the Commission clarify that CMRS operators providing interconnected VoIP services may deliver location information to a PSAP in the same manner as for CMRS, specifically delivering longitude and latitude coordinates to the PSAP in lieu of a street address.

Street address location information can be highly misleading when someone is driving on a freeway or located in a park. Latitude and longitude is the most accurate method to communicate a location. However, the method by which the latitude and longitude was acquired must be conveyed to the PSAP along with the date and time the last reading was acquired coupled with any error approximation. In this manner the PSAP will have complete and accurate information by which to understand the characteristics of the location acquisition.

What do consumers expect concerning 911 and E911 for voice calling services and applications?

Consumers expect to reach emergency services when dialing 911. They also expect that the PSAP knows their location so that emergency service can be provided. Consumers expect the same level of service that is available when calling from a landline.

Are such voice-based services and applications the sole means for certain consumers to place voice calls, and thus to access 911?

We have not witnessed that these voice-based services and applications are the sole means to place a voice call. However, they are a frequent means of placing calls and it is highly probable that consumers would expect 911 service availability on these services and applications.

Furthermore, thanks to modern technology, consumers now have the opportunity to operate the cell phone exclusively using a Mobile VoIP service such as Google Voice, Vonage, or Skype. As mobile phones are becoming the primary form of verbal communication, consumers are now relying on this new technology when contacting friends and family, or in cases of emergency, contacting 911 emergency call centers. We have discovered that consumers are not aware of the limitations of the cell phone when contacting emergency services and, consequently, their safety may be inadvertently compromised.

Respectfully submitted,

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